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From: "Nina Bell" <nbell@advocates-nwea.org
Sent: Wed 10/17/2012 6:20:34 PM
Subject: RE: Mid-Coast TMDL Sediment TWG - Information on potential Source(s)
http://www.dnr.wa.gov/Publications/fp_cmer_12_1201.pdf

Unfortunately I am not able to be at the sediment meeting underway today but here's something for DEQ to ponder on this issue with regard to whether the agency can ignore non-road sedimentation in/from both fish- and non-fish-bearing streams:

1998 – EPA/NOAA CZARA finding: Within two years Oregon is to specifically address "protection of medium, small, and non fish bearing streams, including intermittent streams; protection of areas at high risk for landslides; the ability of forest practices to address cumulative impacts of forestry activities; road density and maintenance, particularly on so called 'legacy' roads; and the adequacy of stream buffers for application of certain chemicals." This finding was not limited to temperature of medium, small, and non-fish-bearing streams. Nor was the finding with regard to addressing cumulative impacts of forestry activities limited to temperature.

1999 – IMST Forestry Report: IMST finds that FPA BMPs are inadequate to, inter alia, protect small non fish bearing streams which are essential to recovery of wild salmonids. In this report, the IMST explicitly did not address sedimentation from harvest, only from roads.

2001 EPA/NMFS/USF&WS Review of Oregon Sufficiency Analysis: “The evidence is, however, overwhelming that forest practices on private lands in Oregon contribute to widespread stream temperature problems and degraded salmonid habitat conditions. These effects of forest practices do not meet the goals of the CWA or ESA.” Cover letter at 2. The agencies concluded that “with a high degree of confidence, that practices under the FPA adversely affect temperature-related factors such as shade levels, surface erosion, landslide rates, stream morphology and substrate, and landscape-scale conditions.” Id. (emphasis added). The federal agencies criticized Oregon's almost exclusive focus on temperature impacts of evaluating shade and the state's concurrent failure to consider the role of sedimentation in evaluating the sufficiency of the state's forestry practices including but not limited to the effect of sedimentation on temperature. Review at 1-2, 6-7, 17. Specifically, the agencies cited studies showing forestry operations caused accumulations of fine sediment that clog salmon spawning gravels. Id. at 6-7.

2004–IMST Temperature Standards Report: The IMST explained how changes in channel morphology, the flow of groundwater and subsurface water, and the removal of riparian vegetation associated with forestry operations all can be measured as increases in stream temperatures. In particular, sedimentation of streams increases temperature. Report at 67-68. Sedimentation affects hyporheic flow. Id. at 74. Vegetation is related to erosion and sedimentation. Id. at 80, 92. The IMST discussed cumulative effects of multiple stressors on salmonids including temperature and fine sediment: “For example, tolerance of coho salmon to suspended sediment at 18°C [64.4°F] was only 33% of the tolerance at 7°C [44.6°F]; (Servizi and Marens 1991).” Id. at 57-58.

2011 Biological Review Team, NMFS Science Center, Oregon Coast coho update: Kim Jones, ODFW reported on monitored aspects of wadeable streams: pools, large wood, fine sediments, and winter habitat noting that in the Oregon Coast coho ESU “most streams have low volumes of wood and high fine sediment.” Report at 18; see also 59.

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Sent: Tuesday, October 16, 2012 9:15 AM
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Subject: Mid-Coast TMDL Sediment TWG - Information on potential Source(s)

Greetings Sediment TWG members,

As part of the source assessment discussion during the Sediment TWG (September 18), one member asked if DEQ was including sediment delivery from silviculture harvest units (as a potential source). Josh indicated that we had not identified this as a potential source, but would look at supporting information provided by TWG members regarding any potential sources.

Dan Avery provided a Report from the Washington DNR on a study that is relevant to the topic, albeit broader in scope. We wanted to share this information with rest of the TWG members:

Results of the Westside Type N Buffer Characteristics, Integrity and Function Study Final Report (CMER 12-1201; Schuett-Hames

et al. 2011)

http://www.dnr.wa.gov/Publications/fp_cmer_12_1201.pdf

Although there is not time set aside during tomorrow's TWG meeting for extensive discussion of this particular Report, comments on the report are welcome during discussions or can be provided to the full TWG via email.

Feel free to forward this information to other interested parties.

Cheers,

R. David Waltz

TMDL Basin Coordinator

Oregon Dept. of Environmental Quality

Phone:541-687-7345